



Christina Martinez <christinamartinezesq@gmail.com>

Chinchilla - Discovery

3 messages

Christina Martinez <christinamartinezesq@gmail.com>
To: "Sukonnik, Marina (LAW)" <msukonni@law.nyc.gov>

Mon, Aug 12, 2024 at 11:57 AM

Hi Marina:

In light of the Judge's recent decision, please find attached executed protective order. Can you get me the citywide panel voting spreadsheet first thing? I need to notice the deposition of someone from the citywide panel in light of the judge's decision on Eichenholtz.

Were you able to confirm a date for Jordan Farnham?

Thank you,

Christina Martinez, Esq.
The Law Offices of Christina M. Martinez
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Signed Chinchilla Protective Order .pdf
261K

Sukonnik, Marina (LAW) <msukonni@law.nyc.gov>
To: Christina Martinez <christinamartinezesq@gmail.com>

Mon, Aug 12, 2024 at 12:46 PM

Hi Christina,

Jordan is available on Wednesday this week. Regarding the Citywide Panel spreadsheet, we object to its production. It has no bearing on the Failure to Accommodate Claim.

Thank you very much,

Marina

Marina Sukonnik

Assistant Corporation Counsel

Labor & Employment Law Division

New York City Law Department

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From: Christina Martinez <christinamartinezesq@gmail.com>
Sent: Monday, August 12, 2024 11:57 AM
To: Sukonnik, Marina (LAW) <msukonni@law.nyc.gov>
Subject: [EXTERNAL] Chinchilla - Discovery

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Christina Martinez <christinamartinezesq@gmail.com>
To: "Sukonnik, Marina (LAW)" <msukonni@law.nyc.gov>

Mon, Aug 12, 2024 at 2:28 PM

First of all, you already agreed to produce the Citywide Panel Voting Spreadsheet at our May 17 Meet and Confer which was confirmed by e-mail. (See your emails to me on May 27 and June 21). More importantly, you represented to Judge Ho on May 20, that Defendants agreed to produce the spreadsheet and that you advised me of such at our Meet and Confer. ECF Doc. No. 41. Second, I requested this on January 19 and you did not object based on relevancy nor did you make any objections at all to this demand. (See Document Request No. 1, all records maintained by the citywide panel concerning Plaintiff's accommodation request). Third, the Judge himself ordered that we could file a stipulated protective order "*so as to allow for the production of the citywide spreadsheet*" on May 23. Fourth, I am not sure how you believe the identity of the decision makers of Chinchilla's reasonable accommodation request is not relevant in a failure to accommodate action. Or the contemporaneous reasons for the denial by the very individuals who made the final determination on her reasonable accommodation request. Fifth, how am I supposed to identify the lower level official on the Citywide Panel to depose if you will not give me the identity of these City Panel decision makers as indicated on this spreadsheet? Sixth, the City routinely produces this spreadsheet in every federal action I have pending. You are the only corporation counsel that is now (suddenly) refusing to produce it.

I am going to have to go back to the judge over this. I am not sure why you are making discovery such a painful process but this is getting out of hand.

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